



**UNITED STATES  
SECURITIES AND EXCHANGE COMMISSION**  
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March 19, 2018

**VIA ECF**

Hon. Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007-1312

Re: SEC v. Todd David Alpert, Case No. 17-cv-1879-LTS-SN

Dear Judge Netburn:

Defendant Todd Alpert has made an offer to settle the claims made by the plaintiff Securities and Exchange Commission, however, that offer must be considered and approved by the Commission. We estimate that it will take approximately 60 days for the Commission to consider the proposed settlement. Accordingly, the parties request that the Court adjourn for at least 60 days the Initial Pretrial Conference, currently scheduled for April 18, 2018 (Dkt. No. 31), to allow the Commission to consider the proposed settlement.

If the Commission approves the settlement, we will promptly file Mr. Alpert's consent to entry of final judgment, and a proposed final judgment for consideration by the Court.

The SEC conferred with counsel for defendant Todd Alpert, who does not object to the request for an adjournment.

Respectfully submitted,

*/s/ John B. Bulgozdy*

John B. Bulgozdy  
Senior Trial Counsel

cc: Robert Knuts, Esq. (via ECF)  
Bruno V. Giofre, Jr., Esq. (via ECF)